

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE REPUBLIC OF IRAQ, including as
PARENS PATRIAE in behalf of the CITIZENS
of the REPUBLIC OF IRAQ,

Plaintiff,

-against-

ABB AG, et alia,

Defendants.

Civil Case No. 08 Civ. 05951 (SHS)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT OF
DEFENDANT AVIO S.P.A.**

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, declaration of Enrico M. Picco, General Counsel and Vice President of AVIO S.p.A, executed on May 24, 2011 and the exhibits attached thereto, the Rule 56.1 Statement of Material Facts, and all prior proceedings and pleadings in this case, Defendant AVIO S.p.A. will move this Court before the Honorable Sidney H. Stein, Room 23A, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on July 20, 2011, or as soon thereafter as counsel may be heard, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting AVIO summary judgment; dismissing Plaintiff's First Amended Complaint as against AVIO in its entirety; awarding AVIO its attorneys fees, costs and disbursements incurred in making motion; and granting AVIO such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 27, 2011

Respectfully submitted,

SCHIFF HARDIN LLP

By: 

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